

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND
(NORTHERN DIVISION)**

DAVID J. BOSHEA,

Plaintiff,

v.

COMPASS MARKETING, INC.

Defendant.

Case No. 1:21-CV-00309-ELH

**MOTION TO QUASH SUBPOENA DUCES TECUM,
OR IN THE ALTERNATIVE, MOTION FOR PROTECTIVE ORDER**

Non-party, James C. DiPaula (“Mr. DiPaula”), through his undersigned attorneys and pursuant to Federal Rule 45 and Federal Rule 26(c), hereby moves to quash the Subpoena Duces Tecum served upon him on or about August 4, 2021 and in the alternative seeks the entry of a Protective Order on the grounds that the information sought by the Subpoena is beyond the scope of discovery and Mr. DiPaula lacks personal knowledge regarding the employment relationship at issue herein. For the reasons set forth in the accompanying Memorandum in Support, the Motion should be granted and the Subpoena should be quashed.

WHEREFORE, Mr. DiPaula respectfully requests that this Court enter an Order quashing the Subpoena Duces Tecum served upon Mr. DiPaula. A proposed Order is filed herewith.

/s/ David B. Hamilton

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 25th day of August, 2021, copies of the Motion to Quash Subpoena Duces Tecum, or in the alternative, Motion for Protective Order, the accompanying Memorandum and Exhibits, and Proposed Order, were filed and served upon all counsel of record via CM/ECF.

/s/ David B. Hamilton

David B. Hamilton (Bar No.04308)